

To: Warner, Len[lwarner@louisberger.com]
Cc: Franklin, Elizabeth A NWK
(Elizabeth.A.Franklin@usace.army.mil)[Elizabeth.A.Franklin@usace.army.mil]; Naranjo,
Eugenia[Naranjo.Eugenia@epa.gov]; AccardiDey, AmyMarie[aaccardidey@louisberger.com]; Clifford
Firstenberg[cfirstenberg@tierrasolutionsinc.com]
From: Brian Mikucki
Sent: Wed 10/12/2016 12:18:14 PM
Subject: RE: NB Phase III Sediment- Additional Topics to discuss with EPA

Good Morning Len

Please see our responses to AmyMarie's questions below in ALL CAPS.

Item #1 TEPH: Has Tierra investigated why the laboratory cannot meet their LCS criteria? The LCS is an independent sample, purchased from an outside vendor. Usually if the LCS is not conforming, then the laboratory should investigate problem and their calibration. If Tierra's corrective action is to "relax" the LCS criteria, then what are the proposed new criteria for the LCS recovery?

TIERRA RESPONSE: IN THIS CASE THE LCS ACCEPTANCE LIMITS LISTED IN THE QAPP WERE NOT PROVIDED BY THE LAB PRIOR TO THE PROJECT, THEY WERE ESTABLISHED PRIOR TO EUROFIN'S INVOLVEMENT IN THE PROJECT SO THEY "INHERITED" THE LIMITS IN THE QAPP. THE LABORATORY METHOD SOP HAS ALTERNATE LCS ACCEPTANCE LIMITS LISTED. AS A RESULT, TIERRA IS REQUESTING THAT THE LCS LIMITS LISTED IN THE QAPP BE CHANGED FROM 70-120% TO 60-120%. TO HELP PUT THIS INTO CONTEXT, CAN USEPA PROVIDE THE LCS LIMITS FOR TEPH-ALKANES THAT THEIR LAB IS OBLIGATED TO MEET; AND, ARE THEY MEETING THEM?

Item #2 Pesticides: A "second source standard" is required to confirm that the laboratory calibration solutions were prepared correctly. I agree that the QAPP frequency of once per 12-hours is not necessary, but I disagree that the second source standard should be removed completely. Please ask Tierra to discuss issue with laboratory; the lab likely routinely runs the second source standard quarterly or when a new stock solution or set of calibration solutions are prepared.

TIERRA RESPONSE: TIERRA DISCUSSED THIS FURTHER WITH THE LABORATORY

AND CONFIRMED THAT A SECOND SOURCE CONFIRMATION IS PERFORMED WITH EVERY INITIAL CALIBRATION. THEREFORE, TIERRA IS REQUESTING THAT THE QAPP FREQUENCY OF ONCE PER 12-HOURS BE REMOVED.

Please let us know if these requests are acceptable, and we will prepare a QAPP field modification accordingly.

Thanks

From: Warner, Len [mailto:lwerner@louisberger.com]
Sent: Friday, October 07, 2016 4:38 PM
To: Clifford Firstenberg <cfirstenberg@tierrasolutionsinc.com>; Brian Mikucki <bmikucki@tierrasolutionsinc.com>
Cc: Franklin, Elizabeth A NWK (Elizabeth.A.Franklin@usace.army.mil) <Elizabeth.A.Franklin@usace.army.mil>; Eugenia Naranjo (Naranjo.Eugenia@epa.gov) <Naranjo.Eugenia@epa.gov>; AccardiDey, AmyMarie <aaccardidey@louisberger.com>
Subject: FW: NB Phase III Sediment- Additional Topics to discuss with EPA

Hello Cliff and Brian:

Please see AmyMarie's questions below regarding the two lab issues that you raised this week.

Best regards, Len

Len Warner

Director | Environmental Evaluation & Forensics

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From: AccardiDey, AmyMarie

Sent: Friday, October 07, 2016 4:21 PM

To: Naranjo, Eugenia <Naranjo.Eugenia@epa.gov>; Warner, Len <lwarner@louisberger.com>; elizabeth.a.franklin@usace.army.mil

Subject: RE: NB Phase III Sediment- Additional Topics to discuss with EPA

Eugenia – Regarding email below from Tierra on laboratory issues:

Item #1 TEPH: Has Tierra investigated why the laboratory cannot meet their LCS criteria? The LCS is an independent sample, purchased from an outside vendor. Usually if the LCS is not conforming, then the laboratory should investigate problem and their calibration. If Tierra's corrective action is to "relax" the LCS criteria, then what are the proposed new criteria for the LCS recovery?

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Regards

AM

AmyMarie Accardi-Dey, Ph.D.

Phone: 914.620.5110

From: Naranjo, Eugenia [<mailto:Naranjo.Eugenia@epa.gov>]

Sent: Wednesday, October 05, 2016 6:45 PM
To: Warner, Len; AccardiDey, AmyMarie; elizabeth.a.franklin@usace.army.mil
Subject: Fw: NB Phase III Sediment- Additional Topics to discuss with EPA

From: Clifford Firstenberg <cfirstenberg@tierrasolutionsinc.com>
Sent: Wednesday, October 5, 2016 5:25:07 PM
To: Naranjo, Eugenia
Cc: Brian Mikucki; Carlie Thompson
Subject: FW: NB Phase III Sediment- Additional Topics to discuss with EPA

Eugenia

I would like to add a brief discussion to our call tomorrow on the following two chemistry-related topics. I hope that AmyMarie will be on the call; if not, we can discuss briefly and then maybe convene a follow-up.

To summarize the two topics described in Brian's email, below:

- TEPH Extractable/Alkanes: discuss relaxation of acceptance limits
- Pesticides-Second Source Confirmation: eliminate

Thanks
Cliff

-

Clifford E. Firstenberg

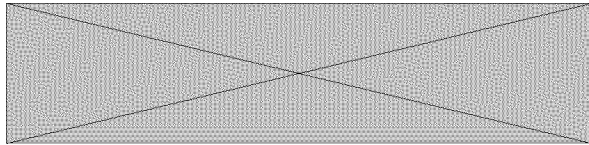
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Thank You.

From: Brian Mikucki

Sent: Wednesday, October 05, 2016 4:57 PM

To: Clifford Firstenberg <cfirstenberg@tierrasolutionsinc.com>

Subject: NB Phase III Sediment- Additional Topics to discuss with EPA

Cliff

In addition to those we have previously discussed, I would like to propose that we add the following two discussion points for our call with EPA tomorrow.

- TEPH Extractable/Alkanes- Eurofins Lancaster is concerned about meeting the QC acceptance limits of 70-120% listed in the QAPP (Worksheet #28-2b page 39 of 56) for the LCS sample. The laboratory has mentioned that during SQT program, 100% of the time said acceptance range was not met resulting in re-extraction and re-analysis. In most cases, the re-extraction and re-analysis LCS recovery range was not met either. This is having financial and logistical (i.e., meeting TAT requirements) impacts on the project.
- Pesticides-Second Source Confirmation. The QAPP requires in WS#28-2a (page 18 of 31) that a Second Source Standard be performed for Pesticides. In order to comply with the QAPP the laboratory would need to procure a second standard from a different vendor and analyze them to ensure that their original standards are in compliance. The QAPP requires that this Second Source Confirmation be performed every 12-hour period. In conversations with FTS I have confirmed that this information is not needed for validation purposes, and in fact required in the validation SOP.

Let me know if you have any questions.

Thanks

Brian Mikucki

Senior Environmental Scientist

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